

**Exhibit A**

**Proposed Order**

**UNITED STATES DISTRICT COURT  
DISTRICT OF DELAWARE**

In re

TPC GROUP INC, *et al.*,

*Debtors,*<sup>1</sup>

Chapter 11

Case No. 22-10493 (CTG)

Jointly Administered

Re: Docket No. \_\_\_\_

BAYSIDE CAPITAL, INC. and  
CERBERUS CAPITAL MANAGEMENT,  
L.P

*Plaintiffs-Appellants,*

v.

TPC GROUP INC.,

*Defendant-Appellee,*

-and-

THE AD HOC NOTEHOLDER GROUP,

*Intervenor-Defendant-  
Appellee.*

Adv. Pro. No. 22-50372 (CTG)

Civ. Action No. \_\_\_\_\_

Re: Docket No. \_\_\_\_

**ORDER GRANTING EMERGENCY MOTION OF APPELLANTS FOR EXPEDITED  
HEARING ON MOTION FOR STAY PENDING APPEAL**

Upon consideration of the emergency motion (the “Motion to Expedite”) of Cerberus Capital Management L.P. and Bayside Capital, Inc. (“Appellants”), for entry of an order (this “Order”)

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<sup>1</sup> The Debtors in these Chapter 11 cases, and the last four digits of their federal tax identification numbers, are: TPC Group Inc. (3618); TPC Holdings, Inc. (7380); TPC Group LLC (8313); Texas Butylene Chemical Corporation (7440); Texas Olefins Domestic International Sales Corporation (4241); TPC Phoenix Fuels LLC (9133); Port Neches Fuels, LLC (1641); and TP Capital Corp. (6248). Each Debtor’s corporate headquarters and mailing address is 500 Dallas St., Suite 2000, Houston, Texas 77042.

expediting and scheduling a hearing on the Stay Motion; and this Court having reviewed the Motion to Expedite and having determined that the legal and factual bases set forth in the Motion to Expedite establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

1. The Motion to Expedite is GRANTED.
2. The hearing on the Stay Motion is scheduled for \_\_\_\_\_, 2022,  
at \_\_\_\_: \_\_\_\_ .m. prevailing Eastern time.
3. Any objections or responses to the Stay Motion may be filed by 12:00 PM  
on the day prior to the hearing.
4. Within one business day after the entry of this Order, Appellants shall  
serve a copy of this Order and a notice for the hearing on the Appellees.
5. This Court shall retain jurisdiction to enforce and interpret the provisions  
of this Order.